

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA  
—WHEELING DIVISION—

DIANA MEY, individually  
and on behalf of a proposed class,

Plaintiff,

v.

Civil Action No. 5:23-CV-46

LEVIN, PAPANTONIO, RAFFERTY,  
PROCTOR, BUCHANAN, O'BRIEN, BARR &  
MOUGEY P.A.; PRINCIPAL LAW GROUP,  
LLC; MCM SERVICES GROUP LLC: and  
JOHN DOE DEFENDANTS 1-5.

Defendants.

**JOINT STIPULATION AND REQUEST FOR ENTRY OF  
PROTECTIVE ORDER**

Plaintiff Diana Mey, Defendant Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mouguey P.A., and Defendant Principal Law Group, LLP (collectively, the "Parties") request that the Court enter the Stipulated Protective Order below. The Parties have consulted and agreed on the terms of the Stipulated Protective Order attached hereto, which conforms to the Model Protective Order adopted by the District Court for the Northern District of West Virginia. The Parties seek entry of this stipulated protective order to protect confidential and proprietary information that may be produced in discovery, and provide guidelines for the Parties to send, receive, and handle such materials, during and after this litigation. As entry of this order will preclude future disputes, it will promote judicial economy.

WHEREFORE, the Parties request that the Court enter the Stipulated Protective Order attached to this request as **Exhibit A**.

Jointly submitted by:

/s/ R. Edison Hill  
R. Edison Hill (WVSB #1734)  
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*Counsel for Defendant LPR*

/s/ Andrew C. Robey  
Ryan M. Donovan (WVSB#1160)  
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*Counsel for Plaintiff*

/s/ Kevin W. Kita

Kevin W. Kita (*admitted pro hac vice*)

SUTTER O'CONNELL

3600 Erieview Tower

1301 East Ninth Street

Cleveland, OH 44114

*Counsel for Defendant PLG*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Hon. John Preston Bailey

United States District Judge

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Defendants.

CERTIFICATE OF SERVICE

I, R. Edison Hill, counsel for defendant Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey P.A., do hereby certify on this 29th day of November, 2023, a true and correct copy of the foregoing "JOINT STIPULATION AND REQUEST FOR ENTRY OF PROTECTIVE ORDER" was electronically filed with the Clerk of Court using the CM/ECF system, which will send information of such filing to the following parties:

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